

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE CENTER FOR INVESTIGATIVE  
REPORTING, INC.,

Plaintiff,

v.

OPENAI, INC., OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, OPENAI  
HOLDINGS, LLC, and MICROSOFT  
CORPORATION,

Defendants.

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI,  
INC., OPENAI LP, OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION, LLC,  
OPENAI HOLDINGS, LLC,

Defendants.

DAILY NEWS, LP; CHICAGO TRIBUNE  
COMPANY, LLC; ORLANDO SENTINEL  
COMMUNICATIONS COMPANY, LLC;  
SUN-SENTINEL COMPANY, LLC; SAN  
JOSE MERCURY-NEWS, LLC; DP MEDIA  
NETWORK, LLC; ORB PUBLISHING, LLC;  
AND NORTHWEST PUBLICATIONS, LLC,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI,  
INC., OPENAI LP, OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION, LLC,  
OPENAI HOLDINGS, LLC,

Defendants.

Civil Action No. 1:24-cv-04872-UA

Hon. Sidney H. Stein

(Hon. Ona T. Wang)

**ORAL ARGUMENT REQUESTED**

Civil Action No. 1:23-cv-11195-SHS  
(consolidated)

Hon. Sidney H. Stein

(Hon. Ona T. Wang)

**ORAL ARGUMENT REQUESTED**

Civil Action No. 1:24-cv-03285-SHS  
(consolidated)

Hon. Sidney H. Stein

(Hon. Ona T. Wang)

**ORAL ARGUMENT REQUESTED**

**NOTICE OF MOTION AND MOTION TO CONSOLIDATE**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Paven Malhotra, the undersigned hereby moves this Court on behalf of Defendants OpenAI, Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, OpenAI Holdings, LLC (collectively, “OpenAI”), and Defendant Microsoft Corporation before the Honorable Sidney H. Stein in Courtroom 23A and Magistrate Judge Ona T. Wang in Courtroom 20D of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York, 10007, for an order pursuant to Federal Rule of Civil Procedure 42(a) consolidating *The Center for Investigative Reporting v. OpenAI Inc., et al.* (1:24-cv-04872) with the already-consolidated *The New York Times Co. v. Microsoft Corp. et al.* (23-cv-11195-SHS) and *Daily News, LP et al. v. Microsoft Corp. et al.* (24-cv-03285-SHS) cases and proceeding on the case schedule set forth in the *New York Times* and *Daily News* cases.

KEKER, VAN NEST & PETERS LLP

Dated: October 4, 2024

By: /s/ Paven Malhotra

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